## MCHENRY T. TICHENOR, JR. 100 CRESCENT COURT, SUITE 700 DALLAS, TEXAS 75201-2112

July 19, 2011

Federal Communications Commission Washington, DC

Re: Docket 11-109

Dear Sir or Madam:

I am a commercial pilot who flies approximately 75,000 miles per year in the U.S. using an aircraft that relies primarily on WAAS-augmented GPS for navigation. Approximately 15% of my flying is conducted in clouds, making it impossible to see other air traffic, towers, buildings, and terrain features such as hills and mountains; my passengers and I are often completely dependent on the accuracy of the GPS system to avoid collisions with those hazards.

While it was once possible to navigate in the U.S. airway system without the use of GPS, such is no longer the case for several reasons. First, GPS navigation has made possible "off-airway" routing, creating substantial additional capacity for the air traffic system to accommodate air traffic. This capacity would be unavailable without a reliable GPS system, resulting in substantial wasteful delays for the flying public. Incidentally, this would also result in substantially higher fuel burns for most flights. Second, access to many U.S. airports in low weather conditions requires GPS, as no other "instrument approach" capability is available at those airports. The FAA's announced plans call for this to be true for more and more airports over the next few years.

It has been conclusively demonstrated that the Lightsquared proposal would interfere with GPS navigation, resulting in a serious degradation to the safety and convenience to the flying public, and to municipalities that rely on GPS-guided aviation for the transport of people and cargo. The costs to the public of granting the proposed license for spectrum adjacent to the GPS band are unacceptably high. I urge you to avoid that result by rejecting the proposal to use this adjacent bandwidth for an interfering activity.

Respectfully submitted,

Max Tilly